

**CHRISTENSEN JAMES & MARTIN**

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*Attorneys for California Ironworkers Field Pension Trust,**California Ironworkers Field Welfare Trust, California and**Vicinity Field Ironworkers Annuity Fund, California Field**Ironworkers Vacation Trust Fund, California Field Ironworkers**Apprenticeship Training and Journeyman Retraining Fund,**Ironworkers Workers' Compensation Trust, California Field**Ironworkers Administrative Trust, and California**Field Ironworkers Labor Management Cooperative Trust***UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

The Trustees of the California  
Ironworkers Field Pension Trust,  
California Ironworkers Field Welfare  
Trust, California and Vicinity Field  
Ironworkers Annuity Fund, California  
Field Ironworkers Vacation Trust Fund,  
California Field Ironworkers  
Apprenticeship Training and Journeyman  
Retraining Fund, Ironworkers Workers'  
Compensation Trust, California Field  
Ironworkers Administrative Trust, and  
California Field Ironworkers Labor  
Management Cooperative Trust,

Plaintiffs,

vs.

Freyssinet, Inc., a Delaware corporation;  
Western Surety Company, a South  
Dakota Company; M. A. Mortenson  
Company, a Minnesota corporation;

Case No.: 2:20-cv-01519-RFB-EJY

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTIONS  
DEADLINES**

1 McCarthy Building Companies, Inc., a  
 2 Missouri corporation; Federal Insurance  
 3 Company, an Illinois corporation; and  
 4 Mortenson-McCarthy Las Vegas  
 5 Stadium, a Joint Venture, a general  
 6 partnership; Merchants Bonding  
 7 Company, an Iowa Company; Travelers  
 8 Casualty and Surety Company of  
 9 America, a Connecticut surety; John  
 10 Does I-XX, inclusive; and Roe Entities I-  
 11 XX, inclusive,

12 Defendants.

13 Trustees of the California Ironworkers Field Pension Trust, et al. (“Plaintiffs”), by and  
 14 through their counsel, Christensen James & Martin, Chtd., Defendants Freyssinet, Inc.  
 15 (“Freyssinet”) and Western Surety Company (“Western”), by and through their counsel Cozen  
 16 O’Connor, Defendants M. A. Mortenson Company, McCarthy Building Companies, Inc.,  
 17 Mortenson-McCarthy Las Vegas Stadium, Federal Insurance Company and Travelers Casualty  
 18 and Surety Company of America, by and through their counsel, McDonald Carano LLP and  
 19 Defendants Raydeo Enterprises, Inc. (“Raydeo”) and Suretec Insurance Company (“Suretec”), by  
 20 and through their counsel, Santoro Whitmire (collectively the “Stipulating Parties”), hereby  
 21 submit this Stipulation and Order to Extend the dispositive motion date.

22 On August 12, 2021 [ECF No. 29], this Court signed a Stipulation and Order which  
 23 extended the dispositive motion cut-off date to February 16, 2022. Thereafter, on October 6,  
 24 2021, the Court entered its Status Conference Order [ECF No. 44] setting a Settlement  
 25 Conference for February 23, 2022 with confidential briefs due on February 16, 2022. Due to the  
 26 setting of the Settlement Conference, the Parties stipulate that the date set for dispositive motions  
 27 should be extended to 30 days after the Settlement Conference or March 25, 2022. This will give  
 the Parties time to prepare their dispositive motions after the Settlement Conference, if needed.

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The Stipulating Parties respectfully request that this Court approve the Stipulation to extend the due date for dispositive motions to March 25, 2022.

Dated this 8th day of February 2022.

CHRISTENSEN JAMES & MARTIN

COZEN O'CONNOR

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IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

Dated: February 9, 2022